



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

**DATE:** AUG 8 2017

**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Waukesha Iron & Metal, Inc. Waukesha, Wisconsin

**FROM:** Scott Connolly, Environmental Engineer  
AECAB (IL/IN)

**THRU:** Nathan Frank, Section Chief  
AECAB (IL/IN)

**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Waukesha Iron & Metal, Inc.

**Facility Location:** 1351 East Main Street, Waukesha, WI 53186

**Date of Inspection:** July 20, 2017

**Lead Inspector:** Scott Connolly, Environmental Engineer, US EPA

**Other Attendees:**

1. Sarah Clark, Environmental Engineer, US EPA
2. Larry Erlich, Owner, Waukesha Iron & Metal, Inc.
3. Jamie Endrizzi, EHS Manager, Waukesha Iron & Metal, Inc.

**Purpose of Inspection:** To determine the facility's compliance with the Clean Air Act.

**Facility Type:** Metal Shredding and Recycling Facility.

**Arrival Time:** 10:45 am

**Departure Time:** 1:10 pm

**Inspection Type:**

- ☒ Unannounced Inspection  
☐ Announced Inspection

## **OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Larry Erlich or Jamie Endrizzi unless otherwise noted.

### **Process Description:**

Waukesha Iron & Metal (WIM) obtains and processes scrap metal received by truck at the facility. WIM obtains metal from metal recyclers, peddlers, auto scrapers and WIM's bin collection service at industrial facilities. Scrap metal is sorted and stored based on grade and type of metal. Cranes load scrap metal onto a conveyor, which feeds the metal into the hammermill shredder. The hammermill is equipped with a hood that pulls air away from the hammermill and routes it through an explosion chamber, cyclone and fabric filter. An automatic water injection system, tied to hammermill amperage, sprays water into the shredder to reduce dust and to cool the metal. Shredded metal exits the shredder and is fed through a magnetic separator, which separates non-magnetics from ferrous metal. Aluminum and copper are separated in two eddy current separators sent to individual storage piles. Fluff is sent by truck to a landfill.

**Staff Interview:** Facility staff stated that they removed fluids, including transmission oil, gas and Freon, prior to shredding. Facility staff stated that during car processing, batteries and rims are removed, and an orange "X" is painted on the bottom of every car, to indicate that it has been processed. Mr. Erlich stated that they do not require auto wreckers to certify that they have removed chlorofluorocarbons (CFCs) in contracts on file, but they do require individual haulers to certify that CFCs have been removed with a signed form (see Appendix B). Monthly records of amount of refrigerant collected by a reclaiming are kept on site. Facility staff stated that no A/C or appliance refrigerant reclamation takes place on site and that these units are not checked for refrigerants. The American Pulverizer hammermill shredder is powered by two 2000 horsepower electric motors and is usually operated at about 40 tons per hour of feed. Facility staff stated that the fabric filter system was stack tested in 2012 and 2014 for volatile organic compounds, particulate matter, lead, and hazardous air pollutants and that emissions are calculated based on total scrap from 2013 scrap production.

## **TOUR INFORMATION**

**EPA toured the facility:** Yes

### **Data Collected and Observations:**

Parts of the aluminum, copper and fluff separation were down at the time of the inspection, which prevented the shredder from shredding cars. A strong metallic odor was noticed around piles of metal swarf, see Image #7. Piles of propane tanks were observed near the shredder being "aired out" prior to shredding. I noticed that the door to the fabric filter system building door was open; facility staff stated that vapors would build up in the room if the door were closed.

**Field Measurements:** were not taken during this inspection.

### RECORDS REVIEW


- Refrigerant Recovery Record from December 2016 (1 copy obtained)
  - Documents reclaimed refrigerant picked up by Refrigerant Recovery, Inc.
  - 5 containers were picked up in December 2016
  - Amount of reclaimed refrigerant is recorded
- Documentation of Refrigerant Removal – Sample Form (1 copy obtained)
  - Certification by Auto company that refrigerants have been removed from the refrigerants prior to delivery at the facility.
  - Form template appears to have been created by the Wisconsin DNR.

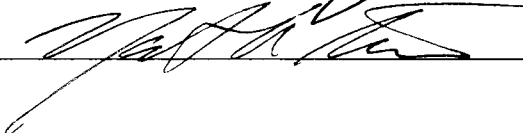
### CLOSING CONFERENCE

#### **Requested documents:**

- Stack test on shredder air system from 2014
- Last 6 months of production dating back to January 2017
- Ozone depleting substance verification statements and removal records

### SIGNATURES

Lead Inspector:  Date: 8/2/2017

Section Chief:  Date: 8/8/17

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**APPENDICES AND ATTACHMENTS**

- Appendix A: Digital Image Log
- Appendix B: Field Notes and Obtained documents

**Facility Name:** Waukesha Iron & Metal  
**Facility Location:** 1351 East Main St. Waukesha, WI  
**Date of Inspection:** July 20, 2017

**APPENDIX A: DIGITAL IMAGE LOG**

<b>1. Inspector Name: Sarah Clark</b>	<b>2. Archival Record Location: CD Labeled: "Waukesha Iron &amp; Metal Inspection 2017-07-20"</b>
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<b>Image Number</b>	<b>File Name</b>	<b>Date and Time (incl. Time zone and DST)</b>	<b>Latitude and Longitude</b>	<b>Description of Image</b>
1	RIMG0001	7/20/2017 11:52 AM CST	Camera Error GPS Coordinates Not Recorded	Storage of cars prior to processing
2	RIMG0002	7/20/2017 11:55 AM CST	Camera Error GPS Coordinates Not Recorded	CFC recovery equipment
3	RIMG0003	7/20/2017 11:55 AM CST	Camera Error GPS Coordinates Not Recorded	Car processing area and car battery storage.
4	RIMG0004	7/20/2017 11:56 AM CST	Camera Error GPS Coordinates Not Recorded	Used oil tanks
5	RIMG0005	7/20/2017 12:00 PM CST	Camera Error GPS Coordinates Not Recorded	Metal Drum storage
6	RIMG0006	7/20/2017 12:05 PM CST	W:088' 12' 35.61" N:043' 01' 05.61"	Another view of the storage area of cars prior to processing
7	RIMG0007	7/20/2017 12:05 PM CST	W:088' 12' 34.398" N:043' 01' 05.916"	Metal swarf storage piles
8	RIMG0008	7/20 /2017 12:11 PM CST	W:088' 12' 33.036" N:043' 01' 07.23"	Shredder system and material storage piles. Crane (right) is loading material on to blue conveyor which feeds the shredder.
9	RIMG0009	7/20/2017 12:13 PM CST	W:088' 12' 26.46" N:043' 01' 07.482"	Propane tank storage pile
10	RIMG00010	7/20/2017 12:18 PM CST	W:088' 12' 26.508" N:043' 01' 07.296"	Out of commission, small shredder that used to handle specialty materials
11	RIMG00011	7/20/2017 12:18 PM CST	W:088' 12' 24.774" N:043' 01' 08.136"	Explosion chamber for the shredder (center), cyclone (left) and Shredder control room (right).
12	RIMG00012	7/20/2017 12:22 PM CST	W:088' 12' 26.274" N:043' 01' 05.454"	Material entering the shredder. The capture hood can be seen on after the material enters the

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				shredder. A small gap before the shredder hood is visible.
13	RIMG0013	7/20/2017 12:42 PM CST	W:088' 12' 25.98" N:043' 01' 04.47"	Roll fabric filter system (clean side)
14	RIMG0014	7/20/2017 12:42 PM CST	W:088' 12' 26.214" N:043' 01' 04.53"	Roll fabric filter system (dirty side)
15	RIMG0015	7/20/2017 12:44 PM CST	W:088' 12' 26.91" N:043' 01' 04.452"	Pressure monitors on fabric filter system.

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**APPENDIX B: FIELD NOTES AND OBTAINED DOCUMENTS**

See attached for Field Notes and Obtained Documents